

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE  
CONFERENCE OF THE NAACP, *et al.*,

Plaintiffs,

v.

THOMAS C. ALEXANDER, *et al.*,

Defendants.

Case No. 3:21-cv-03302-MBS-TJH-RMG

**THREE-JUDGE PANEL**

**Consent Motion for Attorneys'-Eyes-Only Protective Order**

1. On April 12, 2022, the Panel orally ordered Plaintiff South Carolina State Conference of NAACP (NAACP) to provide counsel for House Defendants with the names and addresses of members who reside in each challenged House District. ECF 219. The Panel filed a written order the following day. ECF 221. To protect the associational and privacy rights of NAACP members, the order contemplates that NAACP's disclosure of member information would be subject to an "attorneys' eyes only" protective order.

2. Wherefore, Plaintiff NAACP asks the Panel to enter the parties' joint proposed Attorneys' Eyes Only Order under Fed. R. Civ. P. 26(c), which forbids counsel for House Defendants from disclosing NAACP member information provided by Plaintiff to any person or party, including their clients.

3. Counsel for House Defendants have been consulted regarding this motion and consent to the proposed Attorneys' Eyes Only Order.

Date: April 15, 2022

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Respectfully Submitted,

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\* Motion for admission *Pro Hac Vice* forthcoming

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